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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
  
Plaintiff,  
  
vs.

Abraham Chol Keech,  
  
Defendant.

CR-24-00394-001-PHX-SPL

**JOINT MOTION FOR  
STATUS CONFERENCE**

The parties respectfully request the Court set a status conference at its earliest convenience to discuss the following case-related matters:

(1) **Defendant Abraham Keech’s Rejection of Plea.** On August 18, 2025, counsel for defendant Abraham Keech informed counsel for the government that defendant has rejected the government’s plea offer. The government requests the opportunity to make a record regarding (1) defendant’s understanding of the potential sentence if the matter were to proceed to trial, including the mandatory minimum sentence of 25 years in custody if convicted of Count 4 of the Superseding Indictment (Doc. 71; *see* 18 U.S.C. §§ 2332g(c)(1)); (2) the terms of the government’s plea offer; and (3) defendant’s rejection of the plea offer and desire to proceed with trial. *See Missouri v. Frye*, 132 S. Ct. 1399, 1409 (2012) (advising that a plea offer may be made part of the record “before a trial on the merits” to “ensure that a defendant has been fully advised before those further proceedings commence”).

(2) **Trial Schedule and Related Issues.** The government understands that defense counsel would like to discuss with the Court various issues related to their ability to continue representing defendant, as well as the schedule for trial, which is currently set to begin on September 23, 2025 (Doc. 57). The parties request an opportunity to discuss the upcoming trial schedule and other pretrial deadlines.

To address the issues identified above, the parties jointly request the Court set a status conference at its earliest convenience.

Respectfully submitted this 19th day of August, 2025.

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 19, 2025, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing a copy to the following CM/ECF registrants:

Richard C. Bock and Dominic Rizzi, *Attorneys for Abraham Keech*

*s/Theresa Hanson*  
U.S. Attorney's Office